

# EXHIBIT U

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger,

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

ALPHA PHI ALPHA FRATERNITY  
INC., a nonprofit organization  
on behalf of members residing  
in Georgia; Sixth District of  
the African Methodist  
EPISCOPAL CHURCH, a Georgia  
nonprofit organization; ERIC  
T. WOODS; KATIE BAILEY GLENN;  
PHIL BROWN; JANICE STEWART,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary  
of State of Georgia,  
Defendant.

CASE NO.

1:21-CV-05337-SCJ

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VIDEO DEPOSITION OF

ADRIENNE JONES, Ph.D.

February 15, 2023

10:06 a.m.

Suite 200  
1600 Parkwood Circle SE  
Atlanta, Georgia

S. Julie Friedman, CCR-B-1476

1 House Districts 171 and 173 are heavily Republican  
2 areas?

3 A. Again, I will accept your assertion of the  
4 same.

5 Q. Okay. Did you consider partisanship as a  
6 motivation for voter turnout?

7 A. No. Here, for the purposes of this  
8 report, I'm looking at voter turnout and tactic  
9 impact based upon race.

10 Q. Okay. But you can't rule out partisanship  
11 as a reason for lack of success of black candidates,  
12 can you?

13 MR. CHEUNG: Objection.

14 THE WITNESS: What's the question? I  
15 can't what?

16 Q. (By Ms. LaRoss) Okay. So you didn't  
17 consider partisanship as a -- as a motivation  
18 concerning turnout for purposes of this report?

19 MR. CHEUNG: Objection.

20 THE WITNESS: No. The focus of this  
21 report is race.

22 And to your sort of unstated point in a  
23 lot of instances about Democrats versus  
24 Republicans drawing the maps, I mean, depending  
25 on the time period, that's creating an

1 environment that's very similar, regardless of  
2 party in relationship to black voters in the  
3 state.

4 Q. (By Ms. LaRoss) So can you rule out  
5 part -- partner -- sorry -- partisanship as a reason  
6 for lack of success of black candidates?

7 A. Can I rule it out?

8 Q. Yeah.

9 A. I don't understand why. I don't  
10 understand. Like why would I need to rule it out?

11 Q. So -- So do you consider partner --  
12 partisanship as a factor in the lack of success of  
13 black candidates?

14 A. Do I consider partisanship.  
15 Say it again. Say it again.

16 MS. LaROSS: Just go ahead and read that  
17 back, if you would Julie.

18 (Whereupon, the record was read by the  
19 reporter as requested.)

20 THE WITNESS: I guess -- I guess the  
21 question is taking me off of what I'm presenting  
22 here, which is the State's influence or  
23 participation in making it difficult for black  
24 voters to vote in the state.

25 Partisanship has changed over time in the

1 state historically, so the focus isn't really  
2 here.

3 Like here, I'm not evaluating  
4 partisanship. I'm evaluating the impact of  
5 State, you know, State-authorized legislation,  
6 tactics, environment on the ability of black  
7 voters to access the polls in elections.

8 Q. (By Ms. LaRoss) So can you rule out  
9 partisanship as a factor?

10 A. I think you probably could, because,  
11 again, the partisanship balance of the state has  
12 shifted over time. Challenges for black voters have  
13 persisted, so yes. You could rule that out.

14 Q. Let's look at Page 52 of your report, and  
15 you state in your conclusion that the black Georgians  
16 have not been elected to the degree they should based  
17 on population, and that was changed in the second  
18 report to Black Georgians have not been elected to  
19 the degree that they would have, based on population,  
20 if they had equal and fair access to the state's  
21 electoral system.

22 Was that change made under the direction  
23 of counsel?

24 A. No.

25 But let me -- First, let me take a look